

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ERIC ESSHAKI, as candidate for  
United States Congress and in his  
individual capacity,

Plaintiff,

v.

GRETCHEN WHITMER, Governor  
of Michigan, JOCELYN, BENSON,  
Secretary of the State of Michigan, and

JONATHAN BRATER, Director of  
the Michigan Bureau of Elections, in  
their official capacities,

Defendants.

No. 2:20-cv-10831

Hon. Terrence G. Berg

Mag. Judge Elizabeth A. Stafford

**MOTION FOR LEAVE TO FILE AN  
AMICUS CURIAE BRIEF**

Michael J. Steinberg (P43085)  
Katie Chan\*  
Diane Kee\*  
Brian Remlinger\*  
Civil Rights Litigation Initiative  
University Michigan Law School  
701 South State Street, Ste. 2020  
Ann Arbor, MI 48109  
(734) 615-2407  
mjsteinb@umich.edu

\*Student attorneys practicing  
pursuant to L.R. 83.21

Daniel S. Korobkin (P72842)  
American Civil Liberties Union Fund  
of Michigan  
2966 Woodward Avenue  
Detroit, MI 48201  
(313) 578-6824  
dkorbkin@aclumich.org

Richard S. Hagerstrom (P57885)  
Attorney for Whitney Williams  
and her Committee WhittneyWilliams  
for Congress  
Hagerstrom Law  
222 West Genesee Street  
Lansing, MI 48933  
(517) 763-7499  
scotthagerstrom@yahoo.com

Jean E. Kordenbrock (P56605)  
Fraser Trebilcock Davis & Dunlap, PC  
Co-Counsel for Whitney Williams  
and her Committee Whittney Williams  
for Congress  
124 West Allegan Street, Ste. 1000  
Lansing, MI 48933  
(517) 482-5800

**WHITTNEY WILLIAMS' ON BEHALF OF  
WHITTNEY WILLIAMS FOR CONGRESS  
MOTION FOR LEAVE TO FILE AN AMICUS CURIAE BRIEF**

WHITTNEY WILLIAMS AND HER COMMITTEE WHITTNEY WILLIAMS FOR CONGRESS (HEREAFTER Williams), by and through her/its attorneys, seeks leave to file an amicus curiae brief. In support of this motion, Williams states as follows:

1. Williams is a candidate for Congress in the Michigan 11<sup>th</sup> Congressional District and has filed the necessary signatures with the Michigan Secretary of State to qualify to appear on the August 3, 2020 primary ballot as a Republican. As such Williams has a direct interest in the outcome of this hearing. Williams can speak directly to the issues at hand in this case.

2. This case raises important issues surrounding ballot access the midst of the COVID-19 pandemic, and, specifically, how best to address the issues before the court while remaining faithful to the otherwise well-settled rules and laws governing ballot access.

3. Williams believes that, herself and her campaign can speak directly to the issues at hand in regards to collection of signatures to qualify for the ballot and that her/its amicus brief will be of assistance to the Court

4. Williams proposed amicus curiae brief accompanies this motion.

5. Williams further requests an opportunity to be heard during the Court's motion hearing, scheduled for April 15, 2020 at 2:00pm.

6. Pursuant to Local Rule 7 .1, undersigned counsel sought concurrence in this motion to file an amicus brief on April 15, 2020 via email. Due to the exigency of the matter, and specifically the motion hearing scheduled for today at 2:00pm,

undersigned counsel proceeded by filing this Motion prior to receiving a response from the parties' counsel.

WHEREFORE, Williams respectfully requests that this Court enter an order granting Williams leave to file an amicus curiae brief, and accepting the accompanying brief as filed.

Respectfully submitted,

Respectfully submitted,

Dated: April 15, 2020

/s/ Richard S. Hagerstrom  
Richard S. Hagerstrom (P57885)  
Hagerstrom Law  
222 West Genesee Street  
Lansing, MI 48933  
(517) 763-7499

Dated: April 15, 2020

/s/ Jean E. Kordenbrock  
Jean E. Kordenbrock (P56605)  
Fraser Trebilcock David & Dunlap, PC  
124 West Allegan Street, Ste. 1000  
Lansing, MI 48933  
(517) 482-5800

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following opposing counsel.

By: /s/ Jean E. Kordenbrock  
Jean E. Kordenbrock